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11 United States District Court
12 Northern District of California, San Jose Division

13 VERIGY U.S. INC., a Delaware corporation

14 Plaintiff,

15 vs.

16 ROMI OMAR MAYDER, an individual;
17 WESLEY MAYDER, an individual;
18 SILICON TEST SYSTEMS INC., a
California corporation; SILICON TEST
19 SOLUTIONS LLC, a California limited
liability corporation,

20 Defendants.
21

) Case No. 5:07-cv-04330 (RMW) (HRL)

) **Defendants' Administrative Motion For Leave**
) **To File Documents Under Seal**

) Judge: Hon. Ronald M. Whyte

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1 Pursuant to Civil Local Rules 7-11(a) and 79-5(b), Defendants request that the document
2 entitled "Defendants' Brief in Response to Verigy's Evidentiary Objection" and Exhibits B and
3 Exhibit C to the Declaration of Kevin M. Pasquinelli in Support of Defendants Brief in Response to
4 Verigy's Evidentiary Objection be filed under seal because it contains information that has been
5 designated as confidential or highly confidential under the Stipulated Protective Order entered by this
6 court on August 29, 2007.

7 These documents contain information that has been designated "Confidential" or "Highly
8 Confidential — Attorneys' Eyes Only" by one or more parties under the Stipulated Protective Order.
9 Although the Defendants reserve the right to challenge the designation of certain material by Verigy,
10 information in these materials has been designated as protected from disclosure under the Stipulated
11 Protective Order at the present time. The Defendants rely on that information in support of their
12 response to the order to show cause. The parties' confidentiality interest therefore overcomes the
13 right of public access to the record, as a substantial probability exists that the parties' overriding
14 confidentiality interests will be prejudiced if the record is not sealed. Further, the proposed sealing is
15 narrowly tailored, and no less-restrictive means exist to achieve the parties' overriding interests.

16 The Defendants therefore lodge the above-identified materials with this court pursuant to
17 Civil Local Rule 79-5(b) and 79-5(c) and request leave to file the aforementioned documents under
18 seal.

19 Dated: January 14, 2008

Mount & Stoelker, P.C.

Kevin M. Pasquinelli

/s/

Attorneys for Defendants Romi Mayder, Wesley Mayder,
Silicon Test Systems Inc., and Silicon Test Solutions LLC

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